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VIA ECF

The Honorable Paul Engelmayer, U.S.D.J.
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Lyons v. New York Life Insurance Company, Case No. 1:20-cv-03120

Your Honor:

This firm represents Defendant New York Life Insurance Company ("Defendant") in the above-referenced action. Pursuant to Rule 4(B)(2) of Your Honor's Individual Rules of Practice, Defendant respectfully requests permission to file under seal the Reply Declaration of Brian Seguin in further support of Defendant's Motion for Summary Judgment ("Seguin Reply Declaration") (ECF No. 166). In support of this request, Defendant states that the Seguin Reply Declaration contains the date of birth of Ray Singer, a non-party, and must be redacted in accordance with the Federal Rules of Civil Procedure Rule 5.2(a) and Paragraph 5 of the Parties' so-ordered Confidentiality Stipulation and Protective Order (ECF No. 28). Mr. Singer's date of birth is a material fact that supports Defendant's Motion for Summary Judgment.

Accordingly, Defendant respectfully requests that the Court grant its request to file the unredacted Seguin Reply Declaration under seal and to redact any portion of the Seguin Reply Declaration that discloses Mr. Singer's date of birth on the public docket. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Melissa C. Rodriguez

Melissa C. Rodriguez

cc: Counsel of record (*via ECF*)

Granted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
12/9/21

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